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25 UNITED STATES DISTRICT COURT  
26 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
27 SAN FRANCISCO DIVISION

28 AMERICAN FEDERATION OF  
29 GOVERNMENT EMPLOYEES, AFL-CIO,  
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**PLAINTIFFS' UNOPPOSED MOTION TO  
SHORTEN TIME FOR DEFENDANTS TO  
RESPOND TO MOTION FOR AN ORDER  
REQUIRING PRODUCTION OF  
ADMINISTRATIVE RECORD(S)**

1 Pursuant to Civil Local Rule 6-3, Plaintiffs respectfully move for an Order shortening  
2 Defendants' time to respond to their concurrently filed motion for an order requiring production of  
3 administrative record(s) ("AR"). As set forth in Plaintiffs' motion, Defendants did not meet the  
4 deadline to serve and file the AR. Defendants have taken the position (1) that the Local Rule does  
5 not require production of an AR where Defendants have moved to dismiss and (2) that Defendants  
6 cannot assemble an AR due to purported factual and legal questions regarding the existence of final  
7 agency action; Plaintiffs' move for production of the record on the grounds that Plaintiffs have  
8 identified agency actions for which an AR must be produced, and the circumstances of this case  
9 justify an order requiring swift compliance with the requirement to serve and file the AR.

10 Absent an order shortening time to respond, the motion cannot be noticed for a hearing until  
11 35 days from today. Civ. L.R. 7-2(a). Good cause supports shortening this timeline, given the  
12 importance of swift resolution of these issues and Plaintiffs' immediate need for essential evidence  
13 regarding the legality of decision-making and implementation of the ARPs at issue in this case.  
14 Plaintiffs have conferred with Defendants, who have agreed to a deadline of Monday, August 4 for  
15 their response to the motion. Plaintiffs thus respectfully request that the Court enter the following  
16 proposed schedule:

17 Defendants' opposition to the motion for an order requiring production of administrative  
18 record(s) shall be filed no later than Monday, August 4.

19 Plaintiffs shall file any reply in support of the motion for an order requiring production of  
20 administrative record(s) no later than Tuesday, August 5.

21 A proposed order reflecting this schedule is attached.

22  
23 DATED: July 30, 2025

Respectfully submitted,

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